



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

DEVELOPMENT MANAGEMENT: PROACTIVE PLANNING FROM PRE-APPLICATION TO DELIVERY

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

The Institute's main interest is the extent to which the proposals may affect the historic environment and our comments are tailored to these interests. The aspects in which we are most interested are those relating to the use of conditions, and we shall be responding to the relevant consultation and to the parallel consultation by PINS separately.

The Institute very much supports the consolidation of the advice on development management procedures. In general we think that it is well constructed and clear. Occasionally, however, vagueness sets in: "ensure developers understand the spatial vision and objectives for the area", "the relationship between development management and plan making should be seamless," and "local authorities should foster a culture of partnership and provide a problem solving approach to development proposals, while ensuring that the process remains fair and open". Perhaps these matters need to be referred to, but in these times of reduced resources a greater degree of explicitness as to what actually might be required would be helpful.

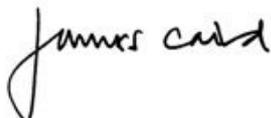
We applaud the reiteration of headline objectives such as place-making, quality and contextual analysis and the sense of proportionality that is promoted.

Whilst we accept that LPAs must be allowed to extend the range of services they charge for, we think that the advice on the application of charging regimes should also be

subject to proportionality. It seems to us to be inappropriate were the need for a few minutes advice to trigger a full-blown consultation exercise requiring costing, agreement, delivery and invoicing and we think the document should make this clear. Policies PA2-5 refer to the need for locally determined policy but do not specifically make this point. We do not think proposals requiring listed building consent alone should be subject to charges at any stage in the planning process.

Otherwise we support the pre-application advice annex. This takes into formal guidance that previously dealt with in *Constructive Talk* the PAS publication supported by CLG and other industry players 3 years ago. Generally, however, the exact terminology has not been perpetuated and a statement somewhere about the relationship between the two documents would be helpful.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large, looping initial 'J'.

James Caird
Consultant Consultations Co-ordinator